

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION  
2006 MAY 11 A 9:45

THOMAS DOUGLAS, as Administrator of the )  
Estate of SEBERA GAYLE DOUGLAS, )  
deceased, )  
Plaintiff, )  
vs. )  
TMA FOREST PRODUCTS GROUP, et al. )  
Defendants. )

CASE NUMBER:  
2:06-cv-188-WKW-SRW

**MOTION TO ADMIT COUNSEL *PRO HAC VICE***

COMES NOW E. Bryan Nichols of the law firm of Maynard, Cooper & Gale, P.C. , a member of the United States District Court for the Middle District of Alabama, and moves this Court to enter an Order admitting John C. Berghoff Jr., Mark R. Ter Molen and Matthew C. Sostrin of Mayer, Brown, Rowe & Maw, LLP, 71 S. Wacker Drive, Chicago, Illinois 60606, to practice before this Court in the above styled case as attorneys for Defendant, Pactiv Corporation. In support of this motion, Movant states as follows:

1. John C. Berghoff, Jr., Mark R. Ter Molen and Matthew C. Sostrin of Mayer, Brown, Rowe & Maw, LLP are members in good standing and are admitted to practice in the United States District Court for the Northern District of Illinois. Their respective Certificates of Good Standing of the United States District Court for the Northern District of Illinois are attached hereto as Exhibits A, B, and C. respectively.
2. The prescribed fee of \$60.00 has been paid to the Clerk of the Court with the filing of this motion.

3. The admission *pro hac vice* of Mr. Berghoff, Mr. Ter Molen and Mr. Sostrin in this action will greatly assist in the presentation of issues for adjudication by the Court. They are familiar with the relevant facts and circumstances involved in these proceedings and will be actively associated with Maynard, Cooper & Gale as counsel in this matter.

4. Mr. Berghoff, Mr. Ter Molen and Mr. Sostrin have never been disciplined by any court and understand that their admission *pro hac vice* subjects them to the disciplinary jurisdiction of this Court.

WHEREFORE, premises considered, Movant respectfully requests that this Court grant this Motion and admit John C. Berghoff Jr., Mark R. Ter Molen and Matthew C. Sostrin to practice before this Court in the above-styled action.



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E. Bryan Nichols  
Bar Number: NC036

One of the Attorneys for Defendant  
*Pactiv Corporation*

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2006, I served the foregoing upon the following persons via U.S. Mail:

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